

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION**

Timothy Tangen,

Plaintiff,

v.

Fluor Intercontinental, Inc., et al.,

Defendants.

C/A No.: 6:21-cv-00335-JD

Marissa Brown,

Plaintiff,

C/A No.: 6:21-cv-01427-JD

v.

Fluor Intercontinental, Inc., et al.,

Defendants.

Shelby Lubelt, individually, on behalf of the Estate of Tyler Lubelt, and as next friend of V.I., minor,

C/A No.: 6:21-cv-01420-JD

Plaintiff,

v.

Fluor Intercontinental, Inc., et al.,

Defendants.

Lakeia Stokes,

Plaintiff,

C/A No.: 6:21-cv-01086-JD

v.

Fluor Intercontinental, Inc., et al.,

Defendants.

Maggie Bilyeu,

Plaintiff,

v.

Fluor Intercontinental, Inc., et al.,

Defendants.

C/A No.: 6:21-cv-01078-JD

Addie Ford,

Plaintiff,

C/A No.: 6:21-cv-01159-JD

v.

Fluor Intercontinental, Inc., et al.,

Defendants.

Marvin Branch,

Plaintiff,

C/A No.: 6:21-cv-01083-JD

v.

Fluor Intercontinental, Inc., et al.,

Defendants.

Julianne Perry, individually, on behalf of the Estate of John Perry, and as next friend of L.P. and G.P., minors,

C/A No.: 6:21-cv-01250-JD

Plaintiff,

v.

Fluor Intercontinental, Inc., et al.,

Defendants.

Haylee Rodriguez,

Plaintiff,

v.

Fluor Intercontinental, Inc., et al.,

Defendants.

C/A No.: 6:21-cv-01084-JD

India Sellers,

Plaintiff,

C/A No.: 6:21-cv-01085-JD

v.

Fluor Intercontinental, Inc., et al.,

Defendants.

Samuel Gabara,

Plaintiff,

C/A No.: 6:21-cv-01007-JD

v.

Fluor Intercontinental, Inc., et al.,

Defendants.

Chris Colavita,

Plaintiff,

C/A No.: 6:21-cv-01017-JD

v.

Fluor Intercontinental, Inc., et al.,

Defendants.

Robert Healy,

Plaintiff,

v.

Fluor Intercontinental, Inc., et al.,

Defendants.

C/A No.: 6:21-cv-01018-JD

**DEFENDANTS FLUOR  
INTERCONTINENTAL, INC. AND  
FLUOR GOVERNMENT GROUP  
INTERNATIONAL, INC.'S NOTICE**

Defendants Fluor Intercontinental, Inc. and Fluor Government Group International, Inc. (collectively, "Fluor") hereby file with this notice, as instructed by chambers, their dispositive motion from *Timothy Tangen v. Fluor Intercontinental, Inc., et al.*, C/A No.: 6:21-cv-00335-JD<sup>1</sup> in order to incorporate the arguments made therein for all of these consolidated cases. Plaintiffs' counsel is aware of the Court's instruction and this filing. Plaintiffs' counsel has indicated they will file their response in opposition from *Tangen*<sup>2</sup> in the same manner so as to fully incorporate the arguments of the parties in all of these consolidated cases. Defendants will file additional dispositive motions by July 30, 2021 in accordance with the deadline set by the Court.

Respectfully submitted,

NEXSEN PRUET, LLC

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<sup>1</sup> See *Tangen* at ECF No. 14.

<sup>2</sup> See *Tangen* at ECF No. 46.

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July 28, 2021  
Greenville, South Carolina